

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN DIVISION**

<p>SYDNEY WARNER, on behalf of herself and all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>WARTBURG COLLEGE,</p> <p>Defendant.</p>	<p>Case No.: 6:21-cv-02029-CJW-MAR</p> <p style="text-align: center;">PROPOSED SCHEDULING ORDER AND DISCOVERY PLAN</p>
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Counsel have conferred and submit the following case information and proposed dates for case management:

1. Did the parties both (a) enter into an agreement during the Rule 26(f) conference resolving all issues relating to initial disclosures, and (b) discuss the preservation, disclosure, and discovery of electronically stored information?

yes no

2. Deadline for motions to add parties: **September 1, 2021**

3. Deadline for motions to amend pleadings: **September 1, 2021**

4. Expert witnesses disclosed by:

 - a) Plaintiff: **February 1, 2022**
 - b) Defendant: **March 15, 2022**
 - c) Plaintiff Rebuttal: **April 15, 2022**

5. Plaintiff shall file class certification motion and expert reports by:

Plaintiff's Proposal: February 15, 2022

Defendant's Proposal: April 15, 2022

6. Defendant shall respond to class certification and expert reports by:

Plaintiff's Proposal: March 15, 2022

Defendant's Proposal: June 15, 2022

7. Plaintiff shall file reply brief and rebuttal expert reports by:

Plaintiff's Proposal: April 15, 2022

Defendant's Proposal: July 15, 2022

8. Deadline for completion of discovery:

Plaintiff's Proposal: May 15, 2022

Defendant's Proposal: August 15, 2022

9. Dispositive motions deadline:

Plaintiff's Proposal: June 15, 2022

Defendant's Proposal: September 15, 2022

10. Trial Ready Date:

Plaintiff's Proposal: December 15, 2022

Defendant's Proposal: March 15, 2023

11. Has a jury demand been filed? yes no

12. Estimated length of trial: 7 days

13. Do the parties unanimously consent to trial, disposition and judgment by a U.S. Magistrate Judge, with appeal to the Eighth Circuit Court of Appeals pursuant to 28 U.S.C. § 636(c)(3)? yes no

14. Are each of the attorneys in this case admitted to practice in the Northern District of Iowa pursuant to Local Rule 83? yes no

Dated: June 23, 2021

Respectfully submitted,

/s/ Brandon M. Bohlman

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**Pro Hac Vice Application Forthcoming*

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